

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

| | |
|---|---|
| IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION | Master File No. 2:12-MD-02327 MDL No. 2327 |
| THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBIT ATTACHED HERETO | JOSEPH R. GOODWIN U.S. DISTRICT JUDGE |

JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants, Johnson & Johnson, Inc., Ethicon, Inc., and/or Ethicon LLC (collectively, the “Ethicon Defendants”), jointly move the court to dismiss with prejudice these actions and all claims against the Ethicon Defendants which were, or could have been asserted, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii). Each party shall bear her or its own costs.

Respectfully submitted,

/s/ Carolyn R. Guest
Carolyn R. Guest
Martin & Jones
410 Glenwood Ave., Ste. 200
Raleigh, NC 27603
919-821-0005
crg@m-j.com
Counsel for Plaintiffs

/s/ William M. Gage
William M. Gage (MS Bar #8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson
Susan M. Robinson (W. Va. Bar #5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 24338

(304) 414-1800
srobinson@tcspllc.com

Counsel for the Ethicon Defendants

EXHIBIT A

| <u>Case Number</u> | <u>Last Name</u> | <u>First Name</u> |
|---------------------------|-------------------------|--------------------------|
| 2:13-cv-01223 | Shauna | Bennett |
| 2:13-cv-01407 | Janie W. | Bird |
| 2:13-cv-01220 | Linda | Carver |
| 2:12-cv-09164 | Joann J. | Cowan |
| 2:13-cv-01409 | Suzanne | Cromie |
| 2:12-cv-08308 | Sheila | Elliott |
| 2:12-cv-07501 | LaDonna G. | Garner |
| 2:13-cv-05214 | Clara | Hare |
| 2:13-cv-01221 | Cynthia E. | McDougal |
| 2:13-cv-21248 | Billie L. | Merck |
| 2:12-cv-07504 | Johnnie E. | Motes |
| 2:13-cv-01219 | Rosemarie J. | Quinn |
| 2:14-cv-25782 | Mica Frisbie | Ricks |
| 2:12-cv-08045 | Kathleen F. | Rowan |
| 2:15-cv-08525 | Nancy A. | Savage |
| 2:12-cv-07883 | Robyn I. | Zimmerman |
| 2:13-cv-01410 | Virginia | Hillyer |
| 2:13-cv-07265 | Evelyn | McCain |
| 2:12-cv-08310 | Jannis | Shea |

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage